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March 21, 2014

By ECF

Hon. Viktor V. Pohorelsky
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Precision Associates, Inc. et al. v. Panalpina World Transport (Holding) Ltd. et al.*,
E.D.N.Y. Case No. 08-CV-0042 (VVP)

Dear Magistrate Judge Pohorelsky:

As the current counsel for Hellmann Worldwide Logistics, Inc., Hellmann Worldwide Logistics GmbH & Co. KG, and Hellmann Worldwide Logistics Limited Hong Kong (“Hellmann”), we write in connection with the Motion for Substitution of Counsel Pursuant to Stipulation and Request for In Camera Hearing [Dkt. 1002] filed on behalf of the Hellmann defendants in the captioned matter.

The Declaration of Richard A. Walker [Dkt. 1003] was filed under seal in connection with the Motion for Substitution of Counsel Pursuant to Stipulation and Request for In Camera Hearing. We write to request that the Declaration and Request for an In Camera Hearing be held in abeyance while a resolution of issues identified in paragraphs 5 and 8 of the Declaration is discussed with Hellmann.

The Hellmann defendants, however, do wish to proceed with the substitution of counsel with the Court retaining jurisdiction to hear the matter further, if necessary.

Respectfully submitted,

/s/ Richard A. Walker

Richard A. Walker
Kaplan, Massamillo & Andrews, LLC

RAW:

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cc: ECF – All counsel of Record

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As proposed successor counsel for
Hellmann Worldwide Logistics, Inc.,
Hellmann Worldwide Logistics GmbH Co.KG, and
Hellmann Worldwide Logistics Limited Hong Kong